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#### THE RCRA INSPECTION

Introduction

CEI Purpose

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Frequency of CEI

**CEI** Authority

Result of CEI

#### Introduction

- 1965 Solid Waste Disposal Act
- 1976 Resource Conservation and Recovery Act (RCRA)
- 1984 Hazardous and Solid Waste Amendments



# CEI Purpose

- CEI Comprehensive Evaluation
  Inspection
- Mechanism for assessing compliance with Federals and State statues (40 CFR 260-270)
- Used to support Enforcement actions
- Identify and bring non-notifiers into the RCRA program



# CEI Steps

- Site tour of processes focusing on waste generation, storage, treatment, and disposal areas.
- Review required records, including waste determinations, inspections, manifests, training records, waste minimization reports, and contingency plan.



## Frequency of CEI

- TSDFs are required to be inspected once every two years
- All federal or state owned /operated TSDFs are required to be inspected annually
- Authorized states are required to inspect their generators and transporters as required by the RCRA Implementation Plan or State/EPA grant



# **CEI** Authority

 RCRA Subtitle C (Section 3007) gives EPA authority to conduct compliance and evaluation inspections

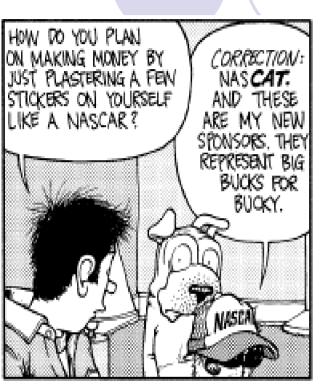
 Access to all records at all reasonable times

Obtain samples of any waste



#### Result of CEI

- Letter documenting no violations found
- A warning letter
- A Notice of Violation
  - This may result in a warning letter
  - This may result in an enforcement action such as an administrative order requiring a payment of a penalty
- A permit denial or modification
- A criminal investigation or action









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